

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,)	
SMARTMATIC)	
INTERNATIONAL HOLDING B.V. and)	
SGO CORPORATION LIMITED,)	
)	
Plaintiffs,)	Case No. 22-cv-00098-WMW-JFD
)	
v.)	
)	
MICHAEL J. LINDELL and MY PILLOW,)	
INC.,)	
)	
Defendants.		

**DECLARATION OF CHRISTOPHER I. KACHOUROFF
IN OPPOSITION TO PLAINTIFFS' MOTIONS TO EXCLUDE THE
TESTIMONIES AND REPORTS OF ROBERT BOWES, BENJAMIN
COTTON, AND PETER KENT**

I, Christopher I. Kachoureff, hereby declare the following:

1. My name is Christopher I. Kachoureff, and I am an attorney admitted in this case *pro hac vice* representing the Defendants Michael Lindell and My Pillow, Inc. in the above-captioned action.
2. Attached as Defendants' Exhibit A is a true and accurate Declaration of expert witness for Defendants, Robert Bowes.
3. Attached as Defendants' Exhibit B is a true and accurate copy of Smartmatic's lawsuit against Fox News.

4. Attached as Defendants Exhibit C is a true and accurate copy of a letter from Obama's former lawyer regarding Smartmatic from June 2010.

5. Attached as Defendants' Exhibit D is a true and accurate copy of a report on Smartmatic and Sequioa from 2008.

6. Attached as Defendants' Exhibit E is a true and accurate copy of Plaintiffs' 6th Supplemental Response to Defendants' Interrogatories.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 13, 2024.

/s/ Christopher I. Kachouroff
Christopher I. Kachouroff* (Bar No. 44216)
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**Admitted Pro Hac Vice*